

REMARKS/ARGUMENTS

Specification

5 In the specification, the abstract was amended to comply with standard length. This amendment was made only to achieve brevity of the abstract and is not intended to nor should be interpreted as an admission or as a narrowing of the breadth of the specification or claims whatsoever.

The Examiner noted (section 10) that there is an extra copy of the beginning of claim 1 on page 39 of the specification which should be cancelled. Applicant was
10 unable to locate this error referred to by the Examiner but will correct it if the Examiner can be more specific.

With respect to figures 4a and 4b, (noted in section 11) the specification has been amended to recite the language required for inclusion of colored drawings per 37 CFR §1.84(a)(2)(iv), three color copies, and one black and white copy, are
15 submitted herewith, together with together with a petition to allow the use of color in the application.

The specification has been therefore been amended to conform to the examiner's objections. No new matter has been added by these amendments. Withdrawal of these objections to the specification is therefore respectfully
20 requested.

Claims

Claims 1-22 are pending in the application and all stand rejected. Characterizations made below of the prior art and of the instant application are believed to be accurate. To avoid any misinterpretation, however, the Examiner
25 should not rely on these characterizations and instead refer to the document cited itself to confirm any the accuracy of any such characterization.

Claim Rejection - 35 USC §112

Claim 20 was rejected under 5 USC §112 for an incorrect dependency. Claim 20 has been amended to meet the Examiner's rejection. Applicant therefore respectfully requests that the Examiner withdraw this rejection.

5

Claim Rejections -35 USC §102

Claims 1, 4, 7 and 21 stand rejected under 35 USC §102(b), and being anticipated by the cited 1999 Cars.com reference.

Claim 1 *inter alia* recites the element of "providing access to E-commerce access to transaction processing with at least one provider of goods and/or services referenced in the more specific second level topic." Applicant can not find any reference in the Cars.com press release to any such "E-commerce access to transaction processing." Because at least this element was not found in the cited prior art reference §102 is inapplicable. The other claims depend from claim and further include additional elements.

For the reasons above, Applicant therefore respectfully requests that the Examiner withdraw these rejections under §102.

Claim Rejections - 35 USC §103(a)

Claims 2, 3, 5, 6, 8 and 9 stand rejected as being obvious in light of the Cars.com reference and Lefkowitz, U.S. Patent 6,091,417 ("Lefkowitz").

There is nothing in the shopping mall template taught in Lefkowitz and the Cars.com press release having related web pages to suggest the combination of the two or providing the motivation to do so. In fact, Lefkowitz may even teach away from any such combination, providing virtual access to individual lone stores, while the Cars.com press release suggests a mere grouping of relevant web sites. There is no suggestion to combine them nor that putting together they would perform the search and access functions of the present invention.

It is therefore incorrect to combine these two references to achieve the present invention and there is no motivation to do so. Applicant respectfully requests that this rejection be withdrawn.

Claims 10, 13 and 16 stand rejected as being obvious in light of the Cars.com reference and the Internet.com Webopedia press release reference.

The Examiner states that the Cars.com reference does not disclose a designator made up of a category and a suffix, but that the Webopedia press release
5 discloses a designator (Webopedia) which is made up of a category and a suffix that gives an indication of the web site's subject matter and function.

There is nothing in the web pages of the Webopedia reference and the Cars.com press release having related web pages to suggest the combination of the two or providing the motivation to do so found in the references. The multi-tiered
10 use of a designator made up of a category and a suffix provides substantial advantages that, were they obvious, would likely have been quickly adopted by both Webopedia and Cars.com to increase the capability of their systems. Neither of these two references suggest any inclination to do so. It is therefore incorrect to combine these two references to achieve the present invention and there is no
15 motivation to do so. Applicant respectfully requests that this rejection be withdrawn.

Claims 11, 12, 14, 17 and 18 stand rejected as being obvious in light of the Cars.com reference and Lefkowitz, and further in view of the Webopedia reference. The Examiner states that Cars.com reference discloses the invention and, with
20 Lefkowitz except for a designator that gives an indication of the web site's subject matter and function, that the Webopedia reference discloses such a designator.

With respect to the Cars.com reference disclosing the present invention, applicant restates and reiterates his argument responsive to the Examiner's 35 USC §102 rejection, above. With respect to combining these references with the
25 Lefkowitz and Webopedia references, applicant restates and reiterates his argument responsive to the Examiner's Claims 10, 13 and 16 in the last section above. Again, the multi-tiered use of a designator made up of a category and a suffix provides clearly enormous and substantial advantages that, were they obvious, would likely have been quickly adopted by both Webopedia and Cars.com to increase the
30 capability of their systems. Moreover, it is not proper to string together multiple

references without showing any motivation to do so to achieve a claimed invention to form a basis of a §103 rejection..

It is therefore incorrect to combine these references to achieve the present invention there is no motivation shown in these references to do so. Applicant
5 respectfully requests that this rejection be withdrawn..

Claims 19, 20 and 22 stand rejected as being obvious in light of the Cars.com reference and Lefkowitz, as taken together disclosing the claimed invention, with Lefkowitz disclosing multiple web sites arranged in a matrix .

10 With respect to the Cars.com reference disclosing the present invention, applicant restates and reiterates his argument responsive to the Examiner's 35 USC §102 rejection, above. With respect to combining these references to achieve a matrix, again, the multi-tiered use of a matrix clearly enormous and substantial advantages that, were they obvious, would likely have been quickly adopted by both
15 Webopedia and Cars.com to increase the capability of their systems. Nor is there anything in these references to suggest or motivate one of skill in the art to combine the references.

It is therefore incorrect to combine these references to achieve the present invention there is no motivation to do so. Applicant respectfully requests that this
20 rejection be withdrawn.

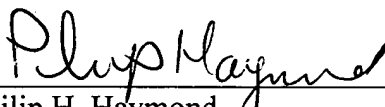
Conclusion

In light of the foregoing, applicant believes that claims 1-22 are now in condition for allowance and respectfully requests a timely Notice of Allowance be issued in this case.

5

Respectfully submitted,

10


Philip H. Haymond
Registration No. 38,177

15 Levin Intellectual Property Group
384 Forest Avenue, Suite 13
Laguna Beach, CA 92651
949.497.7676
Fax 949.497.7679

20